



## City of Tacoma

Mayor Victoria Woodards

September 19, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, District of Columbia 20554

**RE: Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84; Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79**

Dear Ms. Dortch,

As the mayor of Tacoma, Washington, I write to express my grave concerns with the Federal Communications Commission's proposed Declaratory Ruling and Third Report and Order regarding state and local governance and rental rates for public assets with respect to small cell wireless infrastructure deployment.

While I appreciate the Commission's efforts to engage with local governments on this issue and share the Commission's goal of ensuring the growth of cutting-edge broadband services for all Americans, I remain deeply concerned about several proposed provisions as they negatively impact a local government's ability to ensure the health, safety and welfare of our residents. Further, the preemptive measures in the proposal compromise that important role of local governments and expose wireless infrastructure providers to unnecessary liability.

The FCC's proposed new collocation shot clock category is too extreme. The proposal designates any preexisting structure, regardless of its design or suitability for attaching wireless equipment, as eligible for this new expedited 60 day shot clock. When paired with the FCC's previous decision exempting small wireless facilities from federal historic landmark districts, Capitol

environs, and environmental reviews, this places an unreasonable burden on local governments to protect historic preservation efforts, and prevent environmental, safety or other harms to the community.

The FCC's proposed recurring fee structure is an unreasonable overreach that will harm local policy innovation. We disagree with the FCC's interpretation of "fair and reasonable compensation" as meaning approximately \$270 per small cell site. Local governments share the federal government's goal of ensuring affordable broadband access for everyone, regardless of their income level or address. Tacoma has worked in good faith to negotiate fair deals with wireless providers based on a collaborative approach. The Commission's proposal will do nothing but add confusion to the marketplace.

As a local elected official, we are most accountable to our resident's needs. Tacoma is committed to working with the private sector to build the best wireline and wireless broadband infrastructure possible for our businesses and residents. The FCC's proposal will restrict local authority, stunt local innovation, and subsidize small cell broadband providers while discounting the needs of community. We urge you to oppose this Declaratory Ruling and Report and Order.

Sincerely,

A handwritten signature in cursive script, reading "Victoria R. Woodards".

Victoria R. Woodards  
Mayor